

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe,

Plaintiff,

v.

NBCUniversal Media, LLC; Apple Inc.; and John and Jane Does 1–50,

Defendants.

Case No.: 1:25-cv-05690-JPO

**SEALED NOTICE OF EVIDENCE TAMPERING – REMOTE DISABLING OF
PLAINTIFF’S MACBOOK AFTER FEDERAL FILING**

To the Honorable Judge Paul A. Oetken:

Plaintiff respectfully submits this sealed notice to alert the Court to a serious incident of retaliatory obstruction and evidence tampering involving the remote disabling of the primary forensic evidence in this matter: Plaintiff’s work-issued MacBook laptop.

I. BACKGROUND

On **July 17, 2025 at 4:26 PM ET**, Plaintiff submitted a sealed filing to this Court via ECF. That submission included screenshots and forensic records captured from **her work-issued MacBook**, which has been in her possession since her April 15, 2025 whistleblower complaint.

This laptop is **the primary evidentiary artifact** in this matter. It contains:

- Verified metadata,
- Surveillance alerts,
- Device logs and system permissions implicating unauthorized access,

- Screenshots showing screen and audio monitoring.

Plaintiff has consistently documented and preserved this device in anticipation of litigation. The Court filing and accompanying screenshots made clear that the MacBook was an evidentiary asset being submitted for judicial review.

II. EVIDENCE TAMPERING BY DEFENDANTS

At approximately **5:45 PM ET — just over an hour after the Court docketed Plaintiff’s sealed filing** — counsel for NBCUniversal sent an email to Plaintiff’s counsel admitting that:

“Your client would turn over that device... as ‘evidence’ of her unsubstantiated claims...”

...and simultaneously confirmed that NBCUniversal had remotely locked the device through internal IT channels.

Plaintiff had not returned the device. She had not consented to remote access. She had designated the MacBook for forensic use within a federal proceeding — and Defendants, with full knowledge of this fact, disabled it after the Court filing.

III. BASIS FOR RELIEF

This conduct constitutes:

- **Evidence tampering** under 18 U.S.C. § 1512(c),
- **Spoliation and obstruction** of judicial process,
- **Retaliation** for Plaintiff’s protected conduct and her lawful filing in this Court.

This is not theoretical or circumstantial — it is admitted in writing, and the MacBook was disabled in direct response to Plaintiff asserting her rights in federal court.

IV. RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

1. **Issue an immediate preservation order** instructing Defendants to cease all remote interference with Plaintiff’s work-issued MacBook;
2. **Permit Plaintiff to submit the disabled device** to the Court or a neutral forensic expert for secure preservation and analysis;

3. **Authorize a supplemental submission**, including the email from defense counsel, forensic logs of the device state pre/post lockout, and an attestation from Plaintiff's counsel.

Plaintiff remains employed by NBCUniversal and faces ongoing retaliatory containment. This incident demonstrates an escalation in interference and the urgent need for judicial protection of material evidence already designated for this Court.

Respectfully submitted,

Jane Doe
Plaintiff (Pro Se)

Dated: July 17, 2025
Filed Under Seal